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Food Safety And Inspection Service
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AUDIT REPORT FOR BRAZIL
MAY 30 THROUGH JUNE 16, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Brazil's meat inspection system from May 30 through June 16, 2000. Nine of the twenty-five establishments certified to export meat to the United States were audited. Five of these were slaughter establishments, Est. 1651,42,3031,862 and 337; three were conducting processing operations, Ests. 226,736 and 458 and one cold storage facility, Est. 412.

The last audit of the Brazilian meat inspection system was conducted in March 1999. Fourteen establishments were audited: nine were acceptable, est. 2023, 337, 458, 1662, 1793, 2427, 412, 42, and 2979, three were evaluated as acceptable/re-review, 226, 1651, and 504, and two were unacceptable, 736 and 862. Two system failures were reported at that time: neither inspection nor establishment system controls were in place to prevent, detect, control and correct contamination and adulteration of meat products. The major concerns from the previous audit were: edible product handling, inadequate vermin exclusion, inadequate lighting, and dripping condensate. During this new audit four of these establishments were included in the new itinerary.

Deficiencies were as follows:

1. The HACCP plan failed in the product receiving department of establishment 458.

Any meat products from Brazil (all species) must be cooked, this includes shelf stable canned product.

During calendar year 2000, Brazilian establishments have exported nearly 48.5 million pounds of beef to the U.S. Port-of-entry rejections were for miscellaneous defects (0.0007%).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Brazilian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities. Establishments were selected for records audits based on volume of exports and randomly. The third was conducted by on-site visits to establishments. These were selected , first on the basis of the previous year's review, secondly on export records, and the remaining were selected randomly. The fourth was a visit to one laboratory that performed analytical testing of field samples for the national residue testing program, and culturing field samples for the presence of microbiological contamination with *Salmonella*.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Brazil's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials and this was the case with one establishment, (Est.458).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in eight of the nine establishments audited; One establishment, 458, was found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

As stated above, two system failures had been identified during the last audit of the Brazilian meat inspection system, conducted in March 1999. During this new audit, the auditor determined that the system failures had been addressed and corrected.

HACCP-implementation deficiencies had been found in one of the fourteen establishments visited (Est. 862), in 1999. During this new audit, the major implementations of the required HACCP programs was now found to be deficient in one (Est. 458) of the nine establishments visited. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On May 30, an entrance meeting was held at the Brazilian offices of the Brazilian Departmento de Inspecao de Productos de Origem Animal (DIPOA), and was attended by Dr. Suzane Bittencourt, Medica Veterinaria, Dr. Rui Vargas, Medico Veterinario, Dr. Antonio Camardelli, Medico Veterinario, Dr. Carlos E. T. Silva, Medico Veterinario, Dr. Paulo R. Andre, Medico Veterinario, Mr. Joao F. Silva, Agricultural Specialist, U.S. Embassy and Dr. M. Douglas Parks, Auditor USDA-FSIS. Topics of discussion included the following:

1. Compliance and enforcement.

2. Inspection service training.

3. Various requests from USDA, e.g. species testing, residue questionnaire, delistment and relistment policy methodology, micro-testing and laboratory responsibilities.

4. On-site visits.

5. Establishment records audit in the central office.

6. Itinerary.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Brazil's inspection system in March 1999.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.

- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of non-compliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Brazil as eligible to export meat products to the United States were full-time DIPOA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Twenty-five establishments were certified to export meat products to the United States at the time this audit was conducted. Nine establishments were visited for on-site audits. In eight of the nine establishments visited, both DIPOA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

The Laboratorio Regional de APOLO Animal (LARA/RS) in Porto Allegre was audited on June 16, 2000.
Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done, however residue samples are stockpiled for about 14 days. Some of the observations made were as follows:

1. Heavy metals testing; stock solution dilutions were not completely recorded, for instance, the person preparing the solution is not signing the record, no expiration date is recorded,

and the diluted solutions are not ever checked for proper strength by a supervisor or another analyst.
2. Organophosphates are not tested for in Brazil.
3. Testing for nitrofurans in Brazil was stopped on 12 May 2000.
4. There have been no reagents for testing pesticides and chlorinated hydrocarbons since May19, 2000. All samples for these substances had to be forwarded to other laboratories thus causing delays in reporting the results.

Brazil's microbiological testing for *Salmonella* was being performed in government laboratories. One of these, LARA/RS, is the laboratory audited. The auditor determined that the system met the criteria established for the use of laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories were accredited/approved by the government.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Beef slaughter and boning – five establishments (1651, 42, 3031, 862 and 337)
Beef boning and canning – three establishments (226, 736, and 458)
Cold storage only—one establishment (412)

SANITATION CONTROLS

Based on the on-site audits of establishments, Brazil's inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; sanitizers; separation of operations; pest control and monitoring; temperature control; lighting; work space; ventilation; maintenance and cleaning of over-product ceilings and equipment; dry storage areas; personal dress, habits, and hygiene; equipment sanitizing; and product handling and storage.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations.

ANIMAL DISEASE CONTROLS

Brazil's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Brazil's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Brazilian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Brazilian inspection system had controls in place to ensure compliance with requirements regarding animal identification; antemortem inspection and dispositions; humane slaughter; postmortem inspection and dispositions; condemned product control; pre-boning trim; boneless meat re-inspection; ingredients identification; formulations; packaging materials; label approvals; processing equipment and records; and post-processing handling.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements in all of the establishment except one (458) in which the critical control point at receiving failed and no action was taken. Other minor exceptions are as follows:

1. In two establishments (412 and 736) the critical limits were not complete and/or not well defined.
2. Verification procedures were not specific in establishments 412 and 3031.
3. Preventative action was not recorded in establishments 42 and 862.

The following are the deficiencies found in establishment 458.

1. Incorrect limits were set for fecal contamination on incoming carcasses. This resulted in accepting carcasses that were badly contaminated.
2. Monitoring records were not complete. The incoming product temperature was not being monitored as per the critical control limits in the plan.
3. No action was taken when a critical limit was exceeded. The carcass storage room was to be maintained at 1 degree C or less, according to the critical control limit, however records indicated that it reached 2 and 3 degrees and no action was taken.
4. Preventative action was not being recorded.

Testing for Generic *E. coli*

Brazil has adopted the FSIS regulatory requirements for *E. coli* testing.

Five of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements. Only two minor problems were seen both in establishment 1651; the plant location and the sampling person were not designated in the plan.

Establishments had adequate controls in place to prevent meat products intended for Brazilian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, and with the exception of the unacceptable establishment (Est. 458), the DIPOA inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

The exception being establishment 458 in which the HACCP system failed when contaminated carcasses were allowed to enter the establishment.

Testing for *Salmonella* Species

Five of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Brazil has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species VerificationTesting

At the time of this audit, Brazil was exempt from the species verification-testing requirement, having advised FSIS in writing that the following five conditions were being met:

1. Carcasses and products are transported between establishments in devices which are sealed with a tamper-detectable inspection seal by the Inspection Service at the originating establishment and broken by the Inspection Service at the receiving establishment.
2. Brands and sealing devices used by the Inspection Service to identify and seal product are kept under Inspection Service security.
3. Establishments are under continuous Inspection Service supervision while operating. No operations may take place without Inspection Service supervision.
4. Only one species of livestock or meat is allowed in the slaughter or processing areas at one time.
5. Product must be exported to the United States in a cargo container sealed by the Inspection Service.

During the audit, the auditor verified that these conditions continued to be met.

Monthly Reviews

These reviews were being performed by the Brazilian equivalent of Area Supervisors. All were veterinarians with many years of experience.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were usually announced during the week in advance to the inspection personnel only, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly, and sometimes several times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central DIPOA offices in Brasilia, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a team is empowered to conduct an in-depth review, and the results are reported to Drs. Suzane Bittencourt and Rui Vargas for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

These activities were discussed with a DIPOA lawyer. He disclosed that they do not have laws to track felons and once their debt to society is paid they are free to do as they please. They do not have a separate compliance division as USDA does.

Exit Meeting

An exit meeting was conducted in Porto Alegre on June 16, 2000. The Brazilian participants were; Dr. Rui Vargas, Medico Veterinario; Dr. Suzane Bittencourt, Medico Veterinario; and Dr. M. Douglas Parks, International Audit Staff Officer USDA. The following topics were discussed:

1. Laboratory findings and lack of funds for chemicals at the laboratory that was audited. Dr. Rui said that forthcoming funds would be available immediately.

2. Training of veterinarians and inspectors was discussed and the latest training material was given to me to be forwarded to policy.

3. The programs for HACCP, SSOP, *E. coli* and *Salmonella* testing were all discussed and it was noted that any problems in these programs found during the audit would be corrected immediately.

4. Compliance and enforcement were discussed and the latest inspection laws were given to me to be forwarded to policy.

5. A copy of the official delistment letter of establishment 458 was given to me and I was informed they would follow the delineated relistment procedure to include, inspection, notification of policy, reply to their response and notification of relistment.

CONCLUSION

The inspection system of Brazil was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. The deficiencies encountered in Est. 458 during this audit involved only that establishment. Nine establishments were audited: eight were acceptable, and one was unacceptable. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks (signed) Dr. M. Douglas Parks
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory audit form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report (when it becomes available)
H. FSIS Response(s) to Foreign Country Comments (when it becomes available)

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
226	√	√	√	√	√	√	√	√
1651	√	√	no	√	√	no	√	√
412	√	√	√	√	√	√	√	√
736	√	√	√	√	√	√	√	√
42	√	√	√	√	√	√	√	no
3031	√	√	√	√	√	√	√	√
337	√	√	√	√	no	√	√	√
458	√	√	√	√	√	√	√	√
862	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

785	√	√	√	√	√	√	√	√
76	√	√	√	√	√	√	√	√
421	√	√	√	√	no	√	√	
2979	√	√	√	√	√	√	√	√
1662	√	√	√	√	√	√	√	√
2023	√	√	no	√	no	√	√	√
504	√	√	√	√	no	√	√	√
381	√	√	√	√	√	√	no	√
385	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. procedures	11.Adequate documentation	12. Dated and signed
226	√	√	√	√	√	√	√	√	√	√	√	√
1651	√	√	√	√	√	√	√	√	√	√	√	√
412	√	√	√	√	√	√	no	√	√	no	√	√
736	√	√	√	√	√	√	no	√	√	√	√	√
42	√	√	√	√	√	√	√	√	√	√	√	√
3031	√	√	√	√	√	√	√	√	√	√	√	√
337	√	√	√	√	√	√	√	√	√	√	√	√
45 8	√	√	√	√	√	√	no	√	√	√	no	√
862	√	√	√	√	√	√	√	√	√	√	no	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

785	N/A	Cold	storage									
76	√	√	√	√	√	√	no	√	√	√	√	√
421	√	√	√	√	√	√	√	√	no	√	√	√
2979	√	√	√	√	√	√	√	no	√	√	√	√
2023	√	√	√	√	√	√	√	√	√	√	no	√
504	√	√	√	√	√	√	√	√	√	√	√	√
381	√	√	√	√	√	no	√	√	√	√	√	√
385	√	√	√	√	√	√	√	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Samp-ling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
226	N/A processing only									
1651	√	no	no	√	√	√	√	√	√	√
412	N/A processing only									
736	N/A processing only									
42	√	√	√	√	√	√	√	√	√	√
3031	√	√	√	√	√	√	√	√	√	√
337	√	√	√	√	√	√	√	√	√	√
458	N/A processing only									
862	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit.

785	N/A cold storage									
76	N/A processing only									
412	√	√	√	√	√	√	√	√	√	√
2979	√	√	√	√	√	√	√	√	√	√
1662	√	√	√	√	√	no	√	√	√	√
2023	N/A processing only									
504	√	√	√	√	√	√	√	√	√	√
381	N/A processing only									
385	√	√	no	√	√	√	√	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
226	N/A processing only					
1651	√	√	N/A	√	√	√
412	N/A processing only					
736	N/A processing only					
42	√	√	N/A	√	√	√
3031	√	√	N/A	√	√	√
337	√	√	N/A	√	√	√
458	N/A processing only					
862	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

785	N/A cold storage					
76	N/A processing only					
421	√	√	N/A	√	√	√
2979	√	√	N/A	√	√	√
1662	√	√	N/A	√	√	√
2023	N/A processing only					
504	√	√	N/A	√	√	√
381	N/A processing only					
385	√	√	N/A	√	√	√